

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE WITNESS
STEVEN MONTEITH (USPS-T4) TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS OF
DOUGLAS F. CARLSON DFC/USPS-T4-13 THROUGH 14
(May 26, 2021)**

The United States Postal Service hereby provides the response of witness Steven Monteith to the above-listed interrogatories. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,
UNITED STATES POSTAL SERVICE

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**RESPONSES OF USPS WITNESS MONTEITH TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS OF
DOUGLAS F. CARLSON**

DFC/USPS-T4-13. Please describe, and provide any documents relating thereto, all customer feedback that the Postal Service has received that supports the proposal described in this docket to slow delivery of First-Class Mail.

RESPONSE:

Mr. Carlson characterizes the Postal Service's proposal underlying PRC Docket No. N2021-1 as "slow[ing] delivery of First-Class Mail." However, the Postal Service's request for an advisory opinion notes that the proposal will improve the Postal Service's consistency and reliability from a service performance perspective, as well as increase the efficiencies of the transportation network.¹

Notwithstanding, please see the documents referenced in my testimony filed on April 21, 2021 and to the response to POIR No. 1, Question 31, filed on May 17, 2021.

¹ United States Postal Service Request for an Advisory Opinion on Changes in the Nature of Postal Services, PRC Docket No. N2021-1 (Apr. 21, 2021), at pp. 6-7.

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DFC/USPS-T4-14. Please provide all analyses, studies, market research, and other documents that relate to the preferences or opinions of the general public regarding changes to service standards to slow delivery of mail or that do not support the conclusions in your testimony concerning the likely preferences or opinions of the general public regarding the proposal described in this docket.

RESPONSE:

Mr. Carlson characterizes the Postal Service's proposal underlying PRC Docket No. N2021-1 as "slow[ing] delivery of mail." However, the Postal Service's request for an advisory opinion notes that the proposal will improve the Postal Service's consistency and reliability from a service performance perspective, as well as increase the efficiencies of the transportation network.

Notwithstanding, to the extent that Mr. Carlson requests "all analyses, studies, market research, and other documents that relate to the preferences or opinions of the general public regarding changes to service standards," please see the documents referenced in my testimony filed on April 21, 2021 and my response to POIR No. 1, Question 32, filed on May 17, 2021.

To the extent that Mr. Carlson requests "all analyses, studies, market research, and other documents that relate to the preferences or opinions that do not support the conclusions in [my] testimony concerning the likely preferences or opinions of the general public regarding the proposal described in this docket," there are no responsive documents to this request.